

(A) with or without motion or notice if the court acts, or if a request is made, before the original time or its extension expires[.]

Here, good cause exists to grant the requested extension. Defense counsel's ability to prepare Defendants' response has been impaired because she has been out of the office for her son's activities over spring break and with his travel baseball team. The requested extension will cause no prejudice to any party. Accordingly, good cause exists to grant Defendants' request for an extension.

WHEREFORE, Defendants Dustin Dillard, Danny Vasquez, Raymond Dominguez, and Kevin Mansell respectfully ask the Court to grant this unopposed motion and enter an order extending the deadline for them to respond to Intervenor's Motion for New Trial on Damages from March 22, 2024, to March 29, 2024, and award any further relief consistent with this motion that the Court deems necessary and just.

Respectfully submitted,

CITY ATTORNEY OF THE CITY OF DALLAS

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Attorneys for Defendants Dustin Dillard, Kevin Mansell, Danny Vasquez, and Raymond Dominguez

CERTIFICATE OF CONFERENCE

I conferred with Intervenor’s counsel Susan Hutchison by email on March 18, 2024, regarding the substance of this motion and the relief requested. Ms. Hutchison replied via email on March 18, 2024, indicating that Intervenor does not oppose the relief requested in this motion.

/s/ Lindsay Wilson Gowin
Senior Assistant City Attorney

CERTIFICATE OF SERVICE

I certify that on March 22, 2024, I electronically filed the foregoing document with the clerk of court for the U.S. District Court, Northern District of Texas, using the electronic case filing system of the court. The electronic case filing system sent a “Notice of Electronic Filing” to the following attorneys of record who have consented in writing to accept this Notice as service of this document by electronic means.

/s/ Lindsay Wilson Gowin
Senior Assistant City Attorney